

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
BP Texas City HF Release - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #1
INITIAL and FINAL
BP Texas City HF Release

Texas City, TX
Latitude: 29.3791111 Longitude: -94.9291521

To: Kelly Crunk, TCEQ
Lawrence Stanton, Office of Emergency Management
Ragan Broyles, Superfund Division

From: John Martin, OSC

Date: 3/29/2012

Reporting Period:

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date:
Response Authority: CERCLA	Response Type: Emergency
Response Lead: PRP	Incident Category:
NPL Status:	Operable Unit:
Mobilization Date:	Start Date: 3/27/2012
Demob Date:	Completion Date: 3/29/2012
CERCLIS ID:	RCRIS ID:
ERNS No.: NRC# 1006987	State Notification:
FPN#:	Reimbursable Account #:

At 10:01 on 27-Mar-2012, the BP Facility in Texas City, Galveston County, Texas reported to the NRC (Report # 1006987) that they a release of hydrofluoric acid (HF) from a pinhole leak on the Alky #3 Unit during startup operations. The EPA R6 Phone Duty Officer, OSC Ruhl, conducted phone follow-up assessment of the situation and it was decided to mobilized R2, OSC Martin, for an onsite follow up investigation.

2. Current Activities

2.1 Operations Section

OSC Martin departed for Houston Hobby at 0800 on Wednesday, Mar 28, 2012. After arriving, he made several phone contacts and arranged to meet at the BP facility for a debriefing from BP personnel.

Summary of activities and conversations:

Emergency Manager for Texas City (Bruce C. Clawson) - "BC" was immediately notified of the incident via the facility's Shift Manager and he immediately utilized the LEPC's notification system (voice and email) to broadcast a message to the local community. He responded to the scene and coordinated with BP's IMT. The facility's response was good and everything went well.

Fire Chief for the Texas City Fire Department – while the Fire Chief did not actually respond himself due to the assessment that it was a non-event, he relayed information that he was getting from another Fire Captain. After receiving the release notification, they responded with one engine unit to the front gate where they receive a debrief from the BP IMT. After an assessment of the situation and the response efforts by BP, they soon demobilized from the scene.

Meeting with BP personnel (Mark Clingan- Emergency Manager, Chris Green- Process Manager, Mark Berlinger- Safety Manager, Jeff Buchik- Operations Manager, and their IH Steve Briggs who oversaw the air monitoring) - OSC arrived at 1045 and after watching a safety video, he was given a visitor pass and guided to a meeting room:

- At approximately 0800 on March 28, 2012 during an Operations Readiness Review for Start-up, an employee noticed a "puff" coming from where the feed stock of iC4 enters the HF Acid Unit (Alkyl 3 Hydrofluoric Acid Unit). They immediately began emergency procedures which included isolating

the immediate area, notification of response personnel, applying a water spray to the specific area of release, and to begin purging the tower. None of the numerous air monitoring sensors position around the tower had detected anything due to the low concentration of HF released. The purging process removed a majority of the HF from the reaction tank within several minutes.

- As part of their SOP to notify everyone as quickly as possible and to implement all response activities in the most safety conservative manner, they estimated the release to be at the RQ for HF (100#). But after further review of the location of the release, they now estimate that the maximum amount of HF would be no more than 1% of the total release of 12 lbs. The amount of materials release will be finalized in their comprehensive final report.
- One of BP's contractors, CTEH, conducted air monitoring within 15 minutes of the initial notifications. They monitored the air for HF (53 readings) and VOCs (179 readings) in numerous places north (downwind) of the HF Acid Unit both within the facility and in the surrounding community. They did not detect anything over 0.1 ppm for HF or 0.1 ppm for VOCs. They submitted an aerial map of the facility with the monitoring locations identified. Residential housing is located approximately 0.5 miles to the north from the HF Acid Unit.
- As part of their SOPs and precaution, at 0830 they implemented a shelter-in-place for their personnel in the immediate vicinity of the HF Acid Unit. They lifted their shelter-in-place at 1045 when most of the auxiliary piping around the HF Acid Unit was also purged. Based upon the quick response and available information, local officials did not issue a shelter-in-place for the community. BP's FD and CTEH remained on-scene for standby purposes until the water curtain was stopped on Wednesday morning. The iC4 feedstock was re-routed to the flare system and reported as a non-routine event.

After the interview, we visited a control room and observed the HF Acid Unit via live video feed. OSC Martin departed BP at 1245.

2.2 Planning Section

The HF Acid Unit will remain shut down for approximately 2-3 weeks while a full and thorough inspection of the Unit could be made and corrected. BP will complete a comprehensive Final Report.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

Local responders who mobilized to the scene included Texas City Emergency Management, Texas City Fire Department, Texas Commission on Environmental Quality, and the nearby US Coast Guard.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.